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and the Amended Claim 6 Class*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

JANE DOE 1, et al.,

Plaintiffs,

v.

ALEJANDRO MAYORKAS, et al.,

Defendants.

Case No. 5:18-cv-2349-BLF-VKD

~~PROPOSED~~ ORDER GRANTING  
UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL OF  
SETTLEMENT AGREEMENT

~~PROPOSED~~ ORDER

The Court determines, preliminarily, that the Parties' November 15, 2021 Joint Stipulation of Settlement and Release ("Settlement Agreement") (Exhibit 1 to the Williams Decl.) and its terms fall within the range of reasonableness and the range of final approval.

The Court also determines that the Class Notice (Exhibit 2 to the Williams Decl.) and the notice procedure as described in the Settlement Agreement: (1) meet the requirements of Rule 23(e)(1) and due process; (2) are the best practicable notice under the circumstances of this particular case, considering the nature, demographics, and geographic and financial circumstances of the Class Members; (3) are reasonably calculated, under the circumstances, to apprise the Class Members of their right to object to the proposed Settlement Agreement; and are is reasonable and constitute due, adequate, and sufficient notice to all those entitled to receive notice.

Having determined the above, the Court hereby **GRANTS** Plaintiffs' Unopposed Motion for Preliminary Approval of Class Settlement, and orders the following:

1. The proposed Class Notice and notice procedure, as set forth in the Settlement Agreement, are approved;

2. The Parties shall cause the Class Notice to be disseminated in the manner set forth in the Settlement Agreement on or before the Notice Date;

3. Any Class Member who wishes to object to the fairness, reasonableness, or adequacy of the Settlement Agreement must submit his or her objection ("Objection") to the Court in writing, via regular mail on or before the Objection Date, with copies to counsel for the Parties. Such Objection shall include a statement of his or her Objection, as well as the specific reason, if any, for each Objection, including any legal support the Class Member wishes to bring to the Court's attention and any evidence the Class Member wishes to introduce in support of his or her Objection, and to state whether the Class Member and/or his or her counsel wishes to make an appearance at the Approval Hearing, or be barred from separately objecting;

4. The Notice Date is hereby set for three (3) business days after the issuance of this Order.

1           5.       The Objection Date is hereby set for thirty-five (35) days after Class Notice is  
2 mailed and published.

3           6.       The Motion for Final Settlement Approval shall be filed no later than seven (7)  
4 days after the Objection Date.

5           7.       The Final Approval Hearing to consider the fairness, reasonableness, and  
6 adequacy of the Settlement Agreement is hereby set for January 27, 2022 at 9:00am PST **via**  
7 **Zoom.**

8           **IT IS SO ORDERED.**

9  
10 DATED: December 9, 2021

  
Hon. BETH LABSON FREEMAN  
United States District Judge